



EMAGES, INC.

Establishing Managing and Generating Effective Services Inc.

Hattie Wash, Psy. D
*Founder & Chief
Executive Officer*

Larry Ross, LCSW
*Honorary President
Served 1992-2011
(Posthumously)*

Brenda Hodges-Leggard
President

Donna Harris
Vice President

Linda Brown-Jackson
Secretary

Edward Butler, Psy. D
Treasurer

Board Members
Marilyn Scott, Psy. D
Sabrina Nelson
Leatha Woolfolk
Hiram J. White
Arnie Harris
Brad Warner
Marvin Forbes
Mary Cox

October 1, 2018

EXHIBIT 24

EMAGES Policy: 2018-CY-BX-0025

➤ Subaward monitoring policy

On October 1, 2018 EMAGES, Inc. became the recipient of the Office of Justice Programs FY 2018 Second Chance Act Comprehensive Community-Based Adult Reentry program. EMAGES has subawards. All subaward agreements adhere to the Federal Regulations and follow the policies of EMAGES. The monitoring policy for EMAGES subawards are described.

The purpose of monitoring subaward individuals/entities is to ensure the subaward is being used for the authorized purpose of EMAGES, in compliance with the federal program and grant requirements, laws, and regulations; and to ensure the subaward performance goals are achieved. As part of the EMAGES monitoring process, we believe it is important to develop systems, policies, and procedures to ensure that subaward recipients and subaward reviews are conducted in accordance with Federal program and grant requirements, laws, and regulations. Additionally, EMAGES has developed, implemented, and performance procedures to ensure all required audits and audit findings are identified in their audit reports; and are timely and effectively corrected and resolved.

EMAGES will monitor the use of all Federal funds during the program period of FY 2018 to 2021. EMAGES will evaluate the risk of non-compliance with Federal statutes, regulations and terms and conditions of the subaward for purposes of determining the appropriate monitoring. EMAGES methods of monitoring comply with Federal guidelines. Factors we consider in determining the nature, timing, and extent of monitoring are as follows: our prior experience with the same or similar subawards and results of previous audits. This is done whether EMAGES has new personnel or a new or substantially changed system; and to the extent and results of the Federal awarding agency's monitoring.

EMAGES will evaluate at a higher or lower risk if we determine the need for closer monitoring. Generally, EMAGES will determine if new subawards

require closer monitoring. For our existing subawards, closer monitoring may be warranted based on results noted during monitoring. Some of the mechanisms used to monitor subaward activities throughout the year(s) will include regular communication with subaward recipients, and appropriate inquiries concerning program activities; performing subaward site visits to examine programmatic records and observe operations; and reviewing detailed program data and information submitted to us by the subaward recipient.

All subawards will have clearly defined work to be accomplished in furtherance of the Federal award purpose(s). All subawards will require performance/progress reports and supporting documentation with monthly invoices. All performance reports will discuss milestones achieved/to be achieved, any significant problem, issues, or concerns, and timely accomplishments and delays.

If a subaward recipient fails to comply with Federal statutes, regulations, or the terms and conditions of a Federal award, EMAGES will impose additional conditions. However, if it is determined that noncompliance cannot be remedied by imposing additional conditions, EMAGES will take one or more of the following actions: withholding of disbursements or further awards, disallowance of cost, or suspension/termination of subaward.

The purpose of these monitoring activities is to provide reasonable assurance that the subaward recipient is in compliance with Federal laws, regulations, and the provisions of the award and that the required performance goals and objectives are being achieved.